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April 22, 2013

VIA ECF

Hon. A. Kathleen Tomlinson
United States District Court for the
Eastern District of New York
944 Federal Plaza
Central Islip, New York 11722

Re: Friedmann v. Raymour Furniture et al., 12 CV 1307 (LDW)(AKT) (E.D.N.Y.)

Dear Judge Tomlinson:

We represent the Plaintiff in the above-referenced employment discrimination action, wherein Plaintiff was terminated due to his age and disability.

Plaintiff's counsel has been otherwise engaged in significant and intense trial preparation in another action, *Allen v. United Cerebral Palsy of N.Y.C.*, 11 CV 8057 (CM)(KNF) (S.D.N.Y.). We were intended to commence trial in that action this morning, but there was a last-minute settlement.

For that reason, and with consent of Defendant, we respectfully request that the Court grant the parties a very short extension of time to submit the Joint Pre-Trial Order, which is currently due on Wednesday, April 24, 2013. In an abundance of caution, Plaintiff had intended to request until Monday, April 29 to submit the Order, but Defendant will not consent unless the Plaintiff requests until at least Wednesday, May 8, 2013. We respectfully defer to the Court regarding the extension.

Should the Court grant an extension until May 8, we would respectfully request that the Court reschedule the Monday, May 6 Final Pre-Trial Conference until after the Order is submitted.

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We thank the Court for its time and attention to this matter.

Respectfully submitted,
THE HARMAN FIRM, PC

s/

Walker G. Harman, Jr.

cc: Hon. A. Kathleen Tomlinson (via facsimile)
Tara E. Daub, Esq. (via ECF)
Jessica Chiclacos, Esq. (via ECF)
Peter J. Andrews (via ECF)